

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

CRIMINAL NO. 16-806 (JAG)

CARLOS NAVARRO-MERCADO,
Defendant.

UNITED STATES' SENTENCING MEMORANDUM

TO THE HONORABLE COURT:

COMES NOW, the United States of America (the "United States"), by its undersigned counsel, and respectfully states and prays as follows.

I. INTRODUCTION:

The Government has no objections to the PSR. Therefore, the Government will request that the defendant be sentenced at the lower end of the applicable guideline range as per the Presentence Report, which is 18 months.

II. UNDERLYING FACTS OF THE CASE:

The United States does not contest the information included in the defendant's sentencing memorandum (Docket #44), inasmuch as it is corroborated by the PSR (Docket #38). The facts of this case are straightforward:

1. Defendant has a 2001 conviction for a felony offense.
2. On December 19, 2016, the defendant was found in possession of an unloaded 12-gauge Winchester shotgun. Said firearm had its serial number obliterated.

3. In addition, the defendant was found in possession of four (4) 20-gauge rounds of ammunition.

WHEREFORE, the United States respectfully requests that this Honorable Court sentence Mr. Navarro to a term of imprisonment of 18 months.

I hereby certify that on today's date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

RESPECTFULLY SUBMITTED.

San Juan, Puerto Rico, this 25th day of January, 2018.

ROSA EMILIA RODRÍGUEZ-VÉLEZ
United States Attorney

S/MAX PÉREZ-BOURET
Max Pérez-Bouret -222612
Special Assistant United States Attorney
U.S. Attorney's Office
Torre Chardón, Suite 1201
350 Carlos Chardón Ave.
Hato Rey, PR 00918
Tel.: (787) 766-5656
Email: max.j.perez@usdoj.gov